

# **EXHIBIT B-4**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

"JOHN DOE" (A PSEUDONYM) AND MARY DOE (A  
PSEUDONYM),

Plaintiffs,

Index No.: 951468/2021

—against—

YAAKOV DAVID KLAR, YESHIVA TZOIN  
YOSEF AND CHAI LIFELINE, INC., CHEDER  
CHABAD OF MONSEY, YESHIVTH KEHILATH  
YAKOV OF MONSEY a/k/a YESHIVA  
KEHILATH YAKOV, INC.,

Defendants.

STIPULATION EXTENDING  
DEFENDANT'S TIME TO  
ANSWER AND RESOLVING  
PLAINTIFF'S ORDER TO  
SHOW CAUSE FOR AN  
ANONYMOUS DESIGNATION  
FOR THE PLAINTIFFS

**WHEREAS** Plaintiff has filed this action pursuant to the Child Victims Act and has done so using the pseudonym "JOHN DOE" and "MARY DOE" and the caption, JOHN DOE and MARY DOE v. YAAKOV DAVID KLAR, et al.

**WHEREAS**, although under the law Defendant may object to Plaintiff's use of a pseudonym, the undersigned Defendant agrees to waive such objections pursuant to the terms set forth in this Stipulation resolving Plaintiff's Order to Show Cause returnable on November 9, 2021.

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned, that the Parties will comply with the terms and conditions of section III of Case Management Order No. 1 issued by Hon. George J. Silver, D.C.A.J., dated February 24, 2020.

**IT IS FURTHER STIPULATED AND**, by and between counsel for the respective parties, that Defendant, enters into this Stipulation without prejudice to move to uncloak the Plaintiff's true identity and proceed using Plaintiff's true name in the event that Plaintiff willingly and publicly reveals his or her identity in connection with alleged abuse by Defendants,

**IT IS FURTHER STIPULATED AND AGREED**, by and between counsel for the respective parties that Plaintiff's counsel will provide Defendant, with information regarding Plaintiff's true identity pursuant to Section III.3 of Case Management Order No. 1, dated February 24, 2020.

WHEREAS, as of the date of this stipulation, counsel for Defendant, hereby acknowledges and accepts service of the Summons and Complaint on behalf of Defendant,

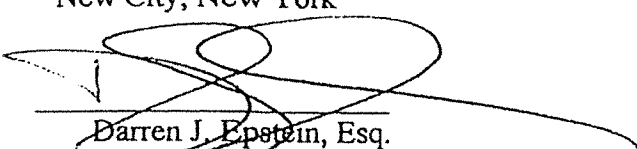
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that Defendant, will respond to the Complaint within 65 days of the date this stipulation is filed with the Clerk of the Court via NYSCEF in accordance with the timeline set forth in the Case Management Order No. 2.

IT IS FURTHER STIPULATED AND AGREED, by and between counsel for the respective parties, that counsels' signature on this Stipulation via facsimile or email, and in counterpart, shall be deemed good and sufficient for all purposes. This stipulation may be electronically filed with the Clerk of the Court without further notice.

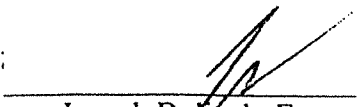
IT IS FURTHER STIPULATED AND AGREED, that defendant's time to appear, answer, or move with extended to and including the 24<sup>th</sup> day of November 2021.

October 24, 2021  
New City, New York

So Ordered:  11/8/21  
DEBORAH A. KAPLAN, J.S.C.



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